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May 29, 2012

Filed Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
4455 12th Street, SW
Washington, DC 20554

Re: *In the Matter of Petitions of Vonage, et. al. for Limited Waiver of
Commission's Rules Regarding Access to Numbering Resources, CC
Docket No. 99-200*

Dear Ms. Dortch:

On Friday May 25, 2012 I had a phone conversation with Mr. Matthew Berry, Chief of Staff to Commissioner Pai, regarding Bandwidth.com, Inc.'s ("Bandwidth") concerns with the pending Petitions for Waivers of Commission's rules to allow Vonage and other non-carrier providers to obtain numbering resources directly from the North American Numbering Plan Administrator. During the phone conversation, I provided Mr. Berry with a brief background of Bandwidth and the Petitions for Waivers. I stated that Bandwidth was becoming increasingly concerned that the Commission might act on a matter of critical importance to the entire communications industry, including state regulators, without the benefit of a thorough and unbiased review of the complete set of issues by the entire Commission. I explained that Bandwidth and others do not believe the Petitions for Waivers are appropriate for resolution through an Ad Hoc waiver process and additionally not through delegation of authority to the Wireline Competition Bureau for a final decision. Further, the fundamental issues that are at the core of the Waiver Petitions are the subject of open Commission proceedings or otherwise in dispute and thus, proceeding with individualized grants of authority to non-carrier providers outside the structure of rulemaking proceedings would be inappropriate.¹

¹

See e.g. Connect American Fund, et al., Further Notice of Proposed Rulemaking on IP-to-IP Interconnection Issues, WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135; WC Docket No. 05-337; CC Docket No. 01-92; CC Docket No. 96-45; WC Docket No. 03-109; WT Docket No. 10-208.

In accordance with Section 1.1206(b), this *ex parte* notification is being filed electronically for inclusion in the public record of the above proceeding. Should there be any questions or concerns regarding this filing, please direct them to the undersigned.

Sincerely,

/S/
Greg Rogers

cc: Mr. Matthew Berry